

OFFICES OF THE ATTORNEY GENERAL

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160 North LaSalle Street  
Chicago, IL 60601-3175



NEIL F. HARTIGAN  
ATTORNEY GENERAL  
STATE OF ILLINOIS

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Public Utilities Division - Rm. 2315

188 West Randolph Street  
Chicago, IL 60601-3084

EPA Region 5 Records Ctr.



351332

Writer's Direct Dial Number  
(312) 793- 2512

October 5, 1983

Mike O'Toole  
United States Environmental  
Protection Agency - 5HR  
230 South Dearborn Street, 13th Flr.  
Chicago, IL 60604

Re: People v. Film Recovery Systems, et al., 38 CH 8312

Dear Mike:

Enclosed are the materials that MSD sent me regarding the leaking trailers at the McCook and Summit sites. Also enclosed is the proposal of Sutton Systems of Dallas, Texas for treating the cyanide tainted film chips.

Very truly yours,

JOSEPH A. DRAZEK  
Assistant Attorney General  
Environmental Control Division  
160 North LaSalle Street, Rm. 900  
Chicago, IL 60601

JAD:bp

Enclosure

NICHOLAS J. MELAS

PRESIDENT



ALLEN S. LAVIN

ATTORNEY

**THE  
METROPOLITAN SANITARY DISTRICT  
OF GREATER CHICAGO**

100 EAST ERIE ST., CHICAGO, ILLINOIS 60611 751-5600

BOARD OF COMMISSIONERS

JOANNE H. ALTER  
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NICHOLAS J. MELAS  
RICHARD J. TROY  
LOUIS VIVERITO

September 28, 1983

SEP 29 1983

Mr. Delbert D. Haschemeyer  
Deputy Director  
Environmental Protection Agency  
2200 Churchill Road  
Springfield, IL 62706

ATTORNEY GENERAL

Re: People of the State of Illinois -vs- Film  
Recovery Systems - Case No. 83 CH 3812

Dear Del:

Confirming today's telephone conversation, I am forwarding copies of the District's records relative to your efforts in securing U.S.E.P.A. funding on an emergency basis for the clean-up of the cyanide chips. The District certainly shares the concern of your office and the Attorney General that an emergency status be extended to this major environmental problem in our area.

By a carbon copy of this letter, I am furnishing the Attorney General's office with the requested documents for his use in these proceedings.

The District looks forward to any support role it can undertake in your emergency-funding efforts.

Very truly yours,

*James B. Murray*  
James B. Murray  
Head Assistant Attorney

JBM:jf  
Enclosure

cc: Mr. Joseph Drazek, Assistant Attorney General  
Messrs. Rimkus / Dalton / Lavin / Lue-Hing / Lanyon

THIS COPY FOR

### CONCILIATION AGREEMENT

This AGREEMENT, entered into by and between the METROPOLITAN SANITARY DISTRICT OF GREATER CHICAGO, a Municipal Corporation, organized and existing under and by virtue of the laws of the State of Illinois, hereinafter called the "DISTRICT" and

VIOLATION	83-263
NOTICE#	1
HEARING	1
DATE	9/23/83

Eagle Trailer Inc., 7710 W 57th St., Summit, Illinois

hereinafter called the "COMPANY":

MSD Treatment Plant \_\_\_\_\_ MSD Waterway Chgo Sanitary & Ship Canal  
Alleged Violations Total cyanide

WHEREAS it has been alleged that the COMPANY has been and/or is presently in violation of the pollution laws contained in the Sewage and Waste Control Ordinance; WHEREAS parties agree to conciliate; NOW, THEREFORE, it is agreed ~~that the COMPANY will attain compliance~~ as follows:

Co. was informed of the discharge of contaminants to the waterway in violation of the Sewage and Waste Control Ordinance.

Co. was informed that MSDGC requires that the discharge of contaminated runoff to the waterway be eliminated immediately.

~~Co. advised MSDGC that it cannot conduct any operations at the site without a court order and the supervision of the IEPA and Attorney General.~~

Co. will set a status report before Judge Green with the appearance of MSD at the earliest possible convenience. Co. will submit a written status report to the District by Oct. 7, 1983.

Co. advised MSDGC that the state court has asserted jurisdiction over the relevant trailers and site and that clean-up operations are subject to the state court's and the IEPA's approval.

COMPLIANCE DATE: \_\_\_\_\_

L. Kollias

Hearing Officer (s)

L. Kollias

D. Riggs-Bonamici

Company Representative (s)

D. Riggs-Bonamici, Atty.

NICHOLAS J. MELAS

PRESIDENT



Cecil Lue-Hing

Director

Research & Development



BOARD OF COMMISSIONERS

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RICHARD J. TROY  
LOUIS S. VIVERITO  
DENNIS F. VOSS

IN THE NAME OF  
THE METROPOLITAN SANITARY DISTRICT OF GREATER CHICAGO  
COOK COUNTY, ILLINOIS

THE METROPOLITAN SANITARY )  
DISTRICT OF GREATER CHICAGO ) COMPLAINT NO. 83-263  
Vs. )  
Eagle Trailer, Inc. )  
WATERWAY  
)  
)

NOTICE OF VIOLATION

TO: Mr. Ronald De Marco, President  
7710 W. 57th Street - Box 130  
Summit, Illinois 60501

Investigation has revealed that you are in violation of Appendix A of the Sewage and Waste Control Ordinance of the Metropolitan Sanitary District of Greater Chicago and the applicable State Statutes pertaining to pollution. Your violation consists of: discharging an effluent with excessive concentrations of cyanide (1.03 mg/l - grab sample at 4:30 p.m. on 9/20/83) into a storm ditch tributary to the Chicago Sanitary and Ship Canal.

You or your authorized representative, are requested to appear at 100 E. Erie St., Industrial Waste Division, Room 413, Chicago, Illinois on 9/23/83 at 3:00 p.m. to conciliate on the subject matter, and to submit, at that time, a plan and schedule for abatement of such pollution. Direct phone inquiries should be made to Jerome Tobias at 751-5697.

YOUR FAILURE TO APPEAR IN RESPONSE TO THIS NOTICE WILL SUBJECT YOU TO SUCH PENALTY AND LEGAL ACTION AS PROVIDED BY LAW.

Witness September 22, 1983  
The Metropolitan Sanitary District  
of Greater Chicago  
Raymond R. Rimkus, General Superintendent  
By *CLH/RL*  
Cecil Lue-Hing, D.Sc., P.E.  
Director  
Research and Development

*Jerome Tobias*  
Jerome Tobias  
Chief Enforcement Officer

TFC/dc

*Wm*

*cc - Pks. Handle.*

THE METROPOLITAN SANITARY DISTRICT OF GREATER CHICAGO  
INDUSTRIAL WASTE DIVISION  
CASE DISPOSITION

F.I.D. # \_\_\_\_\_ Date 9/21/83  
 Company Eagle Trailer, Inc.  
 Location 7701 W. 57th Street - Summit, IL. 60501  
 Violation # \_\_\_\_\_ Compliance Date \_\_\_\_\_  
 ( ) Sanitary Sewer \_\_\_\_\_ (X) Waterway Storm System to Main Channel  
 ( ) Manhole \_\_\_\_\_ ( ) Other \_\_\_\_\_

FIELD INFORMATION	ENFORCEMENT EVALUATION
(X) Inspection <u>9/20/83</u>	( ) In Compliance
Handled By <u>J. Corcoran</u>	(✓) In Violation
(X) Sampling <u>9/20/83</u>	( ) Sanitary Sewer
Sampled By <u>Kukielka - Corcoran</u>	# _____
TYPE OF SAMPLING:	(✓) Waterway <u>CN</u>
(X) Grab ( ) Composite	# <u>83-263</u>
( ) Trailer ( ) Automatic	( ) Other
TYPE OF STUDY:	# _____
( ) Initial Study	<u>DISPOSITION:</u>
( ) Special Investigation # _____	( ) Show Cause
(X) Surveillance	( ) Court
( ) User Technical	( ) Surveillance
( ) User N/R	( ) Resample _____ Days
( ) Compliance	( ) Type _____
( ) Conciliation	( ) No Further Action Necessary
( ) Show Cause	( ) Follow-Up as Necessary
( ) Court	<u>PARAMETERS:</u>
( ) Other _____	( ) All ( ) Cyanide
<u>SECTION:</u>	( ) pH ( ) B.O.D.
( ) North ( ) South	( ) F.O.G. ( ) Bacti
( ) N. Central ( ) User Charge	( ) Metals ( ) _____
(X) S. Central ( ) User N/R	
( ) Waterway	
<u>REMARKS:</u> Inspection and Sampling of this Cyanide Film Chip Trailer Storage Site.	By: <u>Louis Kollias</u> Date: <u>9/23/83</u>

**THE METROPOLITAN SANITARY DISTRICT OF  
GREATER CHICAGO**

DEPARTMENT: Research &amp; Development

DATE: Sept. 21, 1983

TO: James T. Dencek, PCO IV

FROM: James Corcoran, PCO II

SUBJECT: EAGLE TRAILER INC.  
7710 W. 57th St.  
Summit, Il.Inspection of Cyanide Film Chip Trailer Storage Site

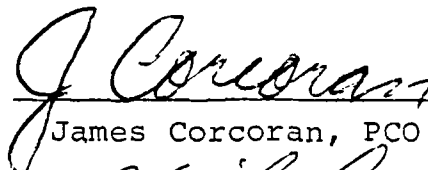
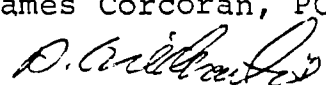
On Sept. 20, 1983, the subject facility was inspected during heavy rain by the writer and Chester Kukielka, PCO I, night supervisor. At this site there are 27 truck trailers containing the cyanide film chips.

The trailers containing cyanide film chips are stored in a fenced area. Company representative, Bob De Marco, was contacted at his office and informed of the purpose of this inspection.

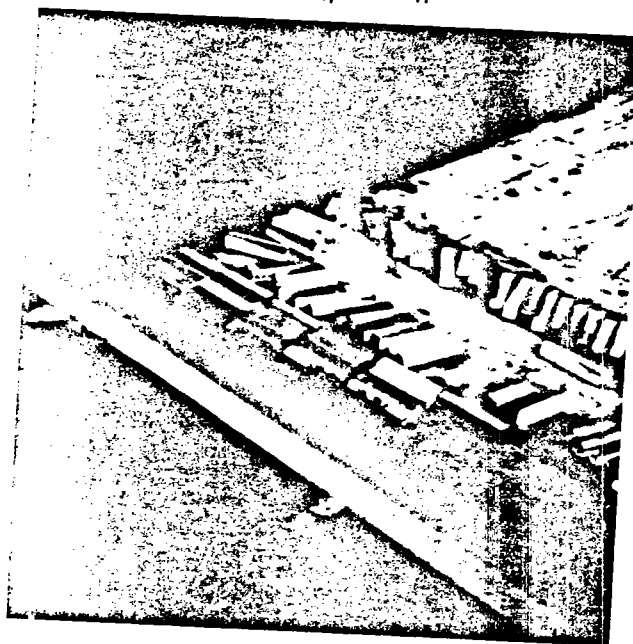
The inspection determined that there were several trailers dripping a light brown material to the ground. In some areas, spilled film chips were observed. The heavy rain was washing the surface under the trailers into a storm ditch outside the fenced area located on the Village of Summit Park property. This ditch is a tributary to a storm system that discharges to the main channel.

At the point where the discharge was leaving the area, where the trailers are stored, and entering the storm ditch, grab samples were obtained by C. Kukielka for cyanide and trace metals analysis. The distance at the point of discharge from the trailer storage area to the storm ditch is about 2 feet.

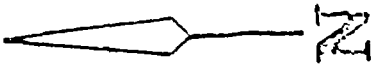
The samples obtained were tagged and delivered to the M.S.D. Main Laboratory by C. Kukielka for analysis. The samples were obtained at 4:30 P.M. The pH was 7.0, light brown with sediment.

  
James Corcoran, PCO II, #111  


JC/cn



*Eagle Trailer Inc. 9-21-83*



P.Y.E. Co.  
now out of business at this site.

Eagle Trailer, Inc.  
7710 W. 57th Street  
Summit, IL.

There are 27 trailers with Cyanide Film Chips at this site.

Runoff  
sampled  
here

Storm

Ditch

Park road

Trailer  
Office

HELICOPTER  
PHOTO 9-21-83

Avenue

Summit Park District Property

J. Corcoran  
I.W.D.  
9/21/83  
not drawn to scale.

Park Building

Ball Diamond



THE METROPOLITAN SANITARY DISTRICT  
OF  
GREATER CHICAGO

IWC FORM #405  
Rev. 4/20/77

INDUSTRIAL WASTES SAMPLING LOG

PLANT EAGLE TRAILER, INC. ☐ SANITARY SEWER  
ADDRESS 7710 W. 57TH ST. STA. RUNOFF INTO SUMMIT PARK DITCH ☒ WATERWAY  
CITY SUMMIT PIPE SIZE — DATE 9-20-83

P.M. TIME	CLARITY Clear, Cldy, Color, etc.	FLOW	WEATHER & CONDITIONS	pH	REMARKS:
12:00 Noon					
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30	X SLY CLDY	MEDIUM TO	PERIODS OF	7	Runoff from Eagle Trailer property
45	FAINTLY BROWN	FAST	RAIN -		into ditch located on north end of
6:00			INTERMITTENT		Summit Park 27 Avenue/Chicago
15					trucks on property from which
30					
45					

## CONCILIATION AGREEMENT

This AGREEMENT, entered into by and between the METROPOLITAN  
SANITARY DISTRICT OF GREATER CHICAGO, a Municipal Corporation,  
organized and existing under and by virtue of the laws of the  
State of Illinois, hereinafter called the "DISTRICT" and

VIOLATION  
NOTICE#  
HEARING  
DATE

262  
83-~~339~~  
1  
1  
9/23/83

J's Mobile Trailer Repair - 8765 Joliet Road - McCook, IL

hereinafter called the "COMPANY":

MSD Treatment Plant \_\_\_\_\_ MSD Waterway Chicago Sanitary & Ship Canal  
Alleged Violations cyanide

WHEREAS it has been alleged that the COMPANY has been and/or is presently in violation of the  
pollution laws contained in the Sewage and Waste Control Ordinance; WHEREAS parties agree to  
conciliate; NOW, THEREFORE, it is agreed ~~that the COMPANY will not be responsible for~~ as follows:  
Com, ny was informed of the discharge of contaminants to the waterways in  
violation of the Sewage and Waste Control Ordinance.

Company was informed that MSDGC requires that the discharge of contaminated  
runoff to the waterway be eliminated immediately.

~~Company advised MSDGC that it cannot conduct any operations at the site  
without a court order and the supervision of the IEPA and Attorney General.~~ XZ 8

Company will set a status report before Judge Green with the appearance of  
MSDGC at the earliest possible convenience.

Company will submit a written status report to the District by October 7, 1983.

Company advised MSDGC that the state court has asserted jurisdiction over  
the relevant trailers and site and that clean-up operations are subject to  
th, state court's and the IEPA's approval.

COMPLIANCE DATE: \_\_\_\_\_

L. Hollis

Hearing Officer (s)  
T. Carmody

J. L. Baime

Company Representative (s)  
J. L. Baime, Attorney



JOANNE H. ALTER  
 THOMAS S. FULLER  
 NELLIE L. JONES  
 JAMES C. KIRIE  
 NICHOLAS J. MELAS  
 CONNIE PETERS  
 RICHARD J. TROY  
 LOUIS S. VIVERITO  
 DENNIS F. VOSS

Cecil Lue-Hing

Director  
 Research & Development

IN THE NAME OF  
 THE METROPOLITAN SANITARY DISTRICT OF GREATER CHICAGO  
 COOK COUNTY, ILLINOIS

THE METROPOLITAN SANITARY )  
 DISTRICT OF GREATER CHICAGO ) COMPLAINT NO. 83-262  
 vs. )  
 J's MOBIL TRAILER REPAIR ) WATERWAY

NOTICE OF VIOLATION

TO: Mr. John B. Wilkins, Owner  
 8765 W. Joliet Road  
 McCook, Illinois 60525

Investigation has revealed that you are in violation of Appendix A of the Sewage and Waste Control Ordinance of the Metropolitan Sanitary District of Greater Chicago and the applicable State Statutes pertaining to pollution. Your violation consists of: discharging an effluent with excessive concentrations of cyanide (15.2 mg/l-grab sample at 3:00 pm on 9/20/83) into a storm sewer tributary to the Chicago Sanitary and Ship Canal.

You or your authorized representative, are requested to appear at 100 E. Erie St., Industrial Waste Division, Room 413, Chicago, Illinois on September 23, 1983 at 3:00 pm to conciliate on the subject matter, and to submit, at that time, a plan and schedule for abatement of such pollution. Direct phone inquiries should be made to Jerome Tobias at 751-5697.

YOUR FAILURE TO APPEAR IN RESPONSE TO THIS NOTICE WILL SUBJECT YOU TO SUCH PENALTY AND LEGAL ACTION AS PROVIDED BY LAW.

*Jerome Tobias*  
 Jerome Tobias  
 Chief Enforcement Officer

TFC/dc

Witness September 22, 1983  
 The Metropolitan Sanitary District  
 of Greater Chicago  
 Raymond R. Rimkus, General Superintendent  
 By *CLH/KL*  
 Cecil Lue-Hing, D.Sc., P.E.  
 Director  
 Research and Development

*Tom - Pls. Handle*

THE METROPOLITAN SANITARY DISTRICT OF GREATER CHICAGO  
INDUSTRIAL WASTE DIVISION  
CASE DISPOSITION

F.I.D. # \_\_\_\_\_ Date 9/21/83  
Company J's Mobil Trailer Repair, Inc.  
Location 8765 West Joliet Road - McCook, Il. 60525  
Violation # \_\_\_\_\_ Compliance Date \_\_\_\_\_  
( ) Sanitary Sewer \_\_\_\_\_ (X) Waterway Storm System to Main Channel  
( ) Manhole \_\_\_\_\_ ( ) Other \_\_\_\_\_

FIELD INFORMATION	ENFORCEMENT EVALUATION
<p>(X) Inspection <u>9/20/83</u> Conducted By <u>J. Corcoran</u> (X) Sampling <u>9/20/83</u> Sampled By <u>J. Corcoran</u> <u>TYPE OF SAMPLING:</u> (X) Grab ( ) Composite ( ) Trailer ( ) Automatic <u>TYPE OF STUDY:</u> ( ) Initial Study ( ) Special Investigation # _____ (X) Surveillance ( ) User Technical ( ) User N/R ( ) Compliance ( ) Conciliation ( ) Show Cause ( ) Court ( ) Other _____ <u>SECTION:</u> ( ) North ( ) South ( ) N. Central ( ) User Charge (X) S. Central ( ) User N/R ( ) Waterway  <u>REMARKS:</u> Inspection and sampling of this Cyanide Film Chip Trailer Storage Site.</p>	<p>( ) In Compliance (X) In Violation (X) Sanitary Sewer <u>Cyanide</u> # <u>83-238</u> ( ) Waterway # _____ ( ) Other # _____  <u>DISPOSITION:</u> ( ) Show Cause ( ) Court ( ) Surveillance ( ) Resample _____ Days ( ) Type _____ ( ) No Further Action Necessary ( ) Follow-Up as Necessary  <u>PARAMETERS:</u> ( ) All ( ) Cyanide ( ) pH ( ) B.O.D. ( ) F.O.G. ( ) Bacti ( ) Metals ( ) _____  By: <u>T. Carnody</u> Date: <u>9/23/83</u></p>

**THE METROPOLITAN SANITARY DISTRICT OF  
GREATER CHICAGO**

DEPARTMENT: Research &amp; Development

DATE: Sept. 21, 1983

TO: James T. Dencek, PCO IV

FROM: James Corcoran, PCO II

SUBJECT: J'S MOBIL SEMI-TRAILER REPAIR, INC.  
8765 W. Joliet Road  
Mc Cook, IL.

Inspection of Cyanide Film Chip Trailer Storage Site

On Sept. 20, 1983, the subject facility was inspected during heavy rain. The writer arrived at the company at approximately 2:45 P.M. At this particular site there are 14 truck trailers containing cyanide film chips.

The trailers are stored at this site with many other trailers that do not contain the cyanide film chips. This area is fenced with ingress and egress at Route 66, at which location there is a house trailer used for office purposes.

During this inspection no one from the company was notified because an inspection was conducted at this site on Sept. 14, in the presence of Mr. John B. Wilkins, owner. He indicated at that time he has no objections to M.S.D. personnel conducting inspections on the property.

This inspection determined that there were several of the cyanide film chip storage trailers dripping a green material to the ground. Because of the heavy rain, the material was being washed into an open grate storm sewer which is located about 30 to 40 feet from where 3 of the trailers are spotted.

At 3:00 P.M., grab samples were obtained of the discharge as it entered the open grate manhole. Samples were obtained for cyanide and trace metals analysis.



During this inspection and sampling the writer was not approached by anyone.

The storm sewer system in this area is a tributary to the main channel.

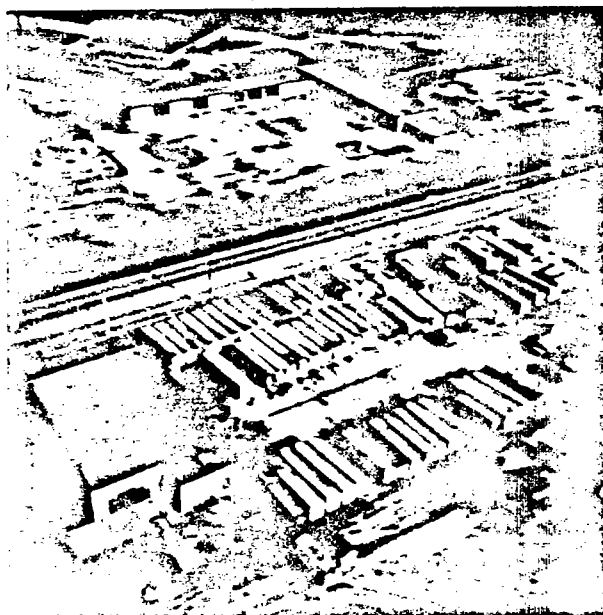
The writer proceeded to Rite-Way Transport, located at

J'S MOBIL SEMI-TRAILER REPAIR, INC.

6201 South East Ave., Hodgkins, Il. to conduct an inspection. Then he proceeded to Eagle Trailer Inc., 7710 W. 57th St., Summit, Il., where he met with Chester Kukielka, PCO I, night supervisor. An inspection and sampling was conducted together. All the samples that were obtained from the 3 cyanide film chip trailer storage sites were tagged and immediately delivered to the M.S.D. Main Laboratory for analysis by C. Kukielka, as directed by Mr. J. Dencek by radio transmission at approximately 4:55 P.M.

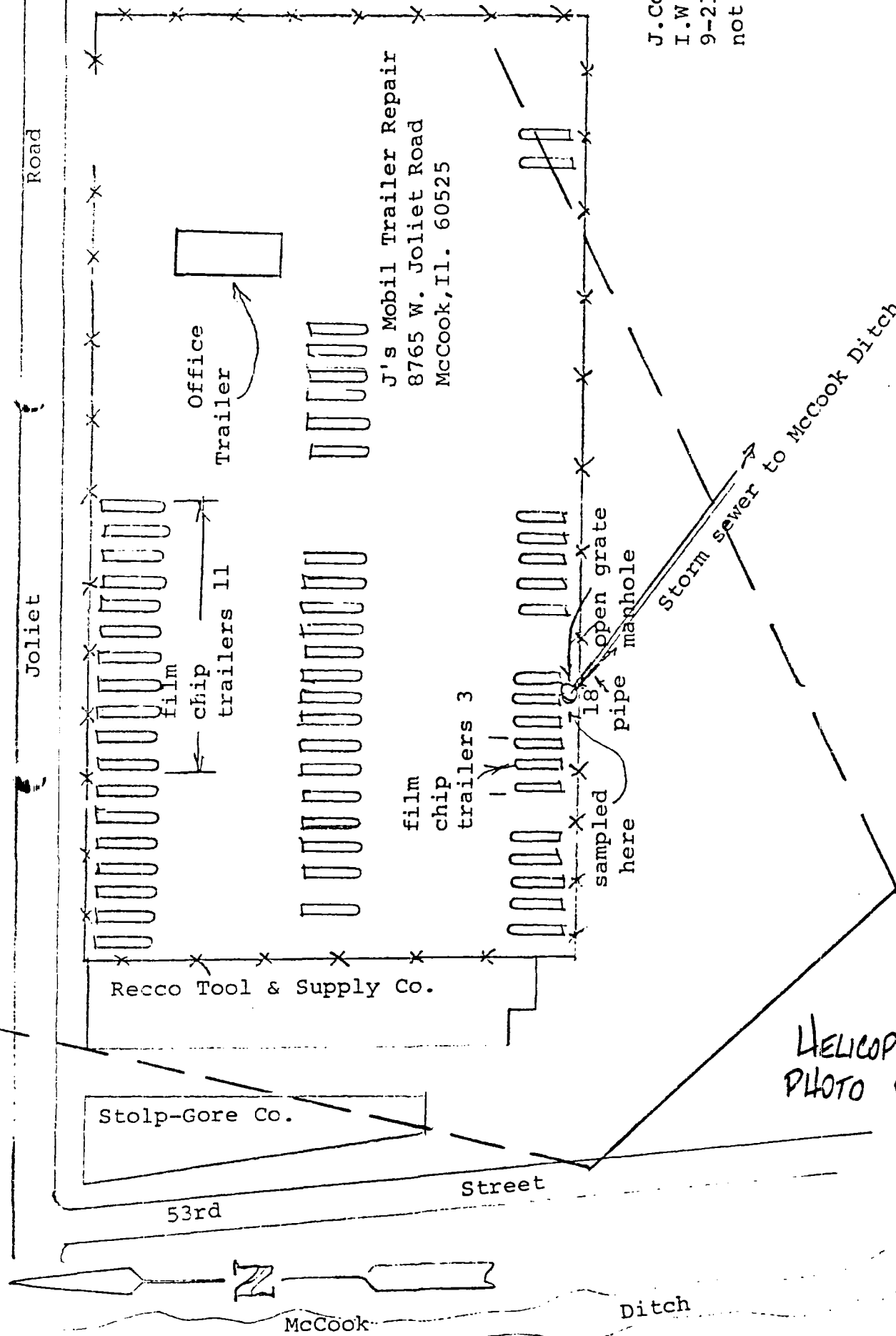
  
James Corcoran, PCO II, #111  


JC/cn



J's Mobil Trailer Repair 9-21-83

J. Corcoran  
I.W.D.  
9-21-83  
not to scale



*For Information Only*

HELICOPTER  
PHOTO 9-21-83



METROPOLITAN SANITARY DISTRICT  
OF  
GREATER CHICAGO

IWC FORM #405  
Rev. 4/20/77

INDUSTRIAL WASTES SAMPLING LOG

PLANT J's MOBILE TRAILER REPAIR RUN OFF INTO ☐ SANITARY SEWER  
ADDRESS 8765 W. JOLIET RD. STA. MANHOLE ☒ WATERWAY  
CITY MCCOOK, IL PIPE SIZE \_\_\_\_\_ DATE 9-20-83

P.M. TIME	CLARITY Clear, Cldy, Color, etc.	FLOW	WEATHER & CONDITIONS	pH	REMARKS:
12:00 Noon					
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3:00	X Cldy Lt. GREEN	FAST 2"	HEAVY RAIN	8.0	RUNOFF INTO OPEN GRATE MANHOLE AT TRAILER #1357 LOCATED AT SOUTHWEST END OF PROPERTY.
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METROPOLITAN SANITARY DISTRICT  
OF  
GREATER CHICAGO

IWC FORM #405  
Rev. 4/20/77

INDUSTRIAL WASTES SAMPLING LOG

PLANT MOBIL  
ADDRESS 8765 WEST JOLIET  
CITY MCCOOK

STA. TRAILER LEAKAGE  
PIPE SIZE \_\_\_\_\_

☐ SANITARY SEWER

☒ WATERWAY

DATE SEPT 15, 1983

A.M. TIME	CLARITY Clear, Cldy, Color, etc.	FLOW	WEATHER & CONDITIONS	pH	REMARKS:
12:00 Mid					
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METROPOLITAN SANITARY DISTRICT  
OF  
GREATER CHICAGO

IWC FORM #405  
Rev. 4/20/77

INDUSTRIAL WASTES SAMPLING LOG

PLANT J's MOBIL ☐ SANITARY SEWER  
ADDRESS 8765 WEST JOLIET RD. STA. TRAILER LEAKAGE ☒ WATERWAY  
CITY MCCOOK PIPE SIZE \_\_\_\_\_ DATE SEPT 14, 1983

P.M. TIME	CLARITY Clear, Cldy, Color, etc.	FLOW	WEATHER & CONDITIONS	pH	REMARKS:
12:00 Noon					
15					
30					
45					
1:00	X Greenish GRAY	DRIPPING		12+	
15	110	SOLID			BLUE FILM CHIPS
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THE METROPOLITAN SANITARY DISTRICT OF GREATER CHICAGO  
INDUSTRIAL WASTE DIVISION  
CASE DISPOSITION

IND. WASTE DIV.  
1983 SEP 21 AM 10:43

MET. SANITARY DISTRICT OF GREATER CHICAGO

F.I.D. # \_\_\_\_\_ Date 9/16/83  
Company J's Mobil Semi-Trailer Repair, Inc. ( Cyanide Film Chip Trailer Storage )  
Location 8765 West Joliet Road - McCook, IL.

Violation # \_\_\_\_\_ Compliance Date \_\_\_\_\_  
( ) Sanitary Sewer \_\_\_\_\_ ( ) Waterway \_\_\_\_\_  
( ) Manhole \_\_\_\_\_ ( ) Other \_\_\_\_\_

FIELD INFORMATION	ENFORCEMENT EVALUATION
(X) Inspection <u>9/14/83</u>	( ) In Compliance
Handled By <u>J. Corcoran-A. Boehme</u>	( ) In Violation
(X) Sampling <u>9/14, 15, 1983</u>	( ) Sanitary Sewer
Sampled By <u>Corcoran-Boehme</u>	# _____
TYPE OF SAMPLING:	( ) Waterway
(X) Grab ( ) Composite	# _____
( ) Trailer ( ) Automatic	( ) Other
TYPE OF STUDY:	# _____
( ) Initial Study	DISPOSITION:
( ) Special Investigation # _____	( ) Show Cause
(X) Surveillance	( ) Court
( ) User Technical	( ) Surveillance
( ) User N/R	( ) Resample _____ Days
( ) Compliance	( ) Type _____
( ) Conciliation	( ) No Further Action Necessary
( ) Show Cause	(X) Follow-Up as Necessary
( ) Court	PARAMETERS:
( ) Other _____	( ) All ( ) Cyanide
SECTION:	( ) pH ( ) B.O.D.
( ) North ( ) South	( ) F.O.G. ( ) Bacti
( ) N. Central ( ) User Charge	( ) Metals ( ) _____
(X) S. Central ( ) User N/R	
( ) Waterway	
REMARKS: <u>Film Chip Trailer Storage Site.</u>	By: <u>T. Carney</u>
	Date: <u>9/22/83</u>

*IRAD has not been cleared*  
JMOIW D66

**THE METROPOLITAN SANITARY DISTRICT OF  
GREATER CHICAGO**

DEPARTMENT: Research &amp; Development

DATE: September 16, 1983

TO: James T. Dencek, PCO IV

FROM: James J. Corcoran, PCO II

SUBJECT: J's Mobil Semi-Trailer Repair, Inc.  
8765 W. Joliet Road  
McCook, IL.

Inspection of Cyanide Film Chip Trailer Storage Sites.

On September 14, 1983 the subject facility was inspected with the presence of Mr. John B. Wilkins, owner. An inspection was made of the 14 Truck Trailers with the Film chips. Many of the trailers were dripping during this inspection and there were stains on the ground that indicate many other trailers were dripping at one time or another. Some of the trailers were deteriorating to a point that the film chips were visible.

Mr. Wilkins explained that the trailers have been on the property that he leases for at least 18 months. Mr. Wilkins advised that about two weeks ago Dombrowski - Holmes Co. were at the site and they tar patched the roofs of the trailers and placed oil dry around the areas where leaking was visible. Mr. Wilkins stated that he has no idea who sent them to work on the trailers. also, the guards are no longer watching the trailers for about the last two months. He has spent about five thousand dollars for an attorney to represent him in court because of the trailers on his property.

Inspection determined that there is a storm sewer system in this parking lot where the drippings from the trailers can very easily enter during rain. It is the opinion of the writer that if the trailers remain on site much longer the deteriorating condition will reach a point where they will not be able to be moved on the public highways safely.

Samples were obtained of the material dripping from one of the trailers on September 14, 15, 1983. Film Chips and the dripping material were contained in quart bottles and delivered to the MSD Main Laboratory for Cyanide analysis.

*J. Corcoran*  
J. Corcoran, PCO II Badge # 111  
*D. Triebels*

Memo from Richard Lanyon

TO:

Mr. Dalton

DATE:

9/23/83

RE:

Film Chips

Narrative history is attached  
as we discussed earlier today.

RL

Summary of Metropolitan Sanitary District of Greater Chicago  
Involvement in Cyanide - Film Chip Issue

In early June 1983, representatives of the District's Research and Development (R&D) and Law Departments were contacted by representatives of the Illinois Attorney General and Petrochem Services, Inc. (Petrochem) concerning the possibility of discharging a process effluent to the District's sanitary sewer system. Said effluent was to result from decontamination of cyanide-laced film chips which were in storage at a number of sites within the District's jurisdiction. The Attorney General was actively involved in litigation against Film Recovery Systems, Inc. and other co-defendants to effect cleanup of these materials. The Attorney General had contracted with Petrochem to perform the detoxification process.

That process was essentially one of placing the film chips into a mixture with water and sodium hydroxide to raise the pH to 12. Sodium hypochlorite would then be added to effect the destruction of the cyanide. After a reaction time of approximately 15-30 minutes, pH was adjusted downward as needed to comply with the District limit of 10.0, and the chips were separated from the liquid with the chips being returned to trucks for storage and disposal. The liquid was to be discharged to the sanitary sewer.

District personnel advised representatives of the Attorney General and Petrochem that discharge to the sanitary sewer system in the District's jurisdiction would be accepted under two conditions: (1) all discharges were to be in compliance with the Sewage and Waste Control Ordinance (Ordinance) and (2) only sites tributary to the West-Southwest and Calumet Sewage Treatment Works

would be permitted for processing. Direct District monitoring was not initiated at that time because of assurances received from the Attorney General's office that their office would provide the necessary monitoring. In late July, the District initiated direct monitoring after information was received from the Attorney General that cyanide concentrations in the discharge to the sewer were higher than expected. Up until that time, processing of the film chips had occurred only at the Aldens site at 5000 West Roosevelt Road, Chicago. R&D personnel inspected the Aldens site and collected samples of wastewater at the site and of residual film chips found in the sewer. Upon discovery of film chips in the sewer on July 28, the R&D Department ordered Petrochem to discontinue any further processing pending investigation and verification of compliance. R&D supervisory personnel thoroughly reviewed the process at the Aldens site on July 29.

On August 1, at the request of the Attorney General's office, R&D personnel attended a meeting at that office with representatives of Petrochem and the Attorney General to review the situation and discuss possible methods of resolving existing problems. That afternoon, R&D personnel collected samples of process discharge at the Aldens site which was routed to and retained in a tank truck. Discharge was not to be permitted until compliance was verified. Analysis of two samples indicated total cyanide levels of 89.7 and 71.6 mg/l which far exceeded the Ordinance limit for discharge to sewers of 10 mg/l. In light of this, the Attorney General and Petrochem personnel were advised that no discharges could be permitted to the District's system.



On August 2, at the request of the Attorney General, R&D and Law personnel attended a court hearing at which the District's recent findings were presented.

The court requested that the District work with the Attorney General and the Illinois Environmental Protection Agency (IEPA) in attempting to reach a solution to the chip disposal problem. As a result, some sampling and analysis were conducted at a company known as American Fotokemi, Inc. in Elk Grove Village, which claimed to have a chemical solution to the cyanide destruction problem. Samples of bench scale tests were collected on August 4 and 5 and analyses did show that the process appeared to be effective in reducing total cyanide below Ordinance limits. However, the company has not performed any larger scale processing since that time.

R&D monitoring efforts continued, particularly at the Aldens site, where residual process effluent was stored in a tank truck on the site. Ultimately, the supernatant in the truck was tested and found to meet Ordinance limits and was allowed to be discharged to the sanitary sewer. Permission was rejected, however, for Petrochem to discharge sediment collected at the bottom of the tank truck.

During September, R&D personnel conducted inspections at six sites on which trailers containing film chips were stored. These were located in Chicago (Aldens), Summit, McCook, Hodgkins, Rosemont, and Chicago Ridge. Problems with trailer integrity, leakage or evidence of same, or spillage of film chips onto ground were noted at all six sites. On September 14 and 15, samples were collected of leachate ponded on the ground from trailers located at the McCook site which revealed total cyanide of 905 and 865 mg/l, respectively.

On Tuesday, September 20, R&D personnel again inspected the sites at Aldens, Summit, McCook, and Hodgkins with respect to the following: (1) Access, (2) condition of trailers, and possible leakage, and (3) potential for runoff to sanitary sewers or waterways. Either direct leakage or evidence of same (i.e., ponded liquid) was found at all four sites. Samples obtained at those sites revealed runoff to a storm ditch and storm sewer at the Summit and McCook sites, respectively, in violation of the Ordinance limits for discharge to waterways of 0.1 mg/l for cyanide. The levels of cyanide detected were 15.2 mg/l at McCook and 1.03 mg/l at Summit.

The Law Department, Attorney General, and IEPA were immediately notified of this action. Violation notices were issued on September 22nd to those companies in possession of the property at the Summit and McCook sites (copies attached). Conciliation meetings were scheduled for 3:00 p.m. on Friday, September 23, 1983 in the Main Office Building. Copies of the resulting conciliation agreements are attached.

**THE METROPOLITAN SANITARY DISTRICT OF  
GREATER CHICAGO**

DEPARTMENT: Research & Development

DATE: Sept. 16, 1983

TO: James T. Dencek, PCO IV

FROM: James J. Corcoran, PCO II

SUBJECT: Rite-Way Transport ( Gemini Leasing )  
6201 South East Avenue  
Hodgkins, Il.

Inspection of Cyanide Film Chip Trailer Storage Sites.

On September 14, 1983 the writer and Al Boehme Visited the subject Company to conduct an inspection of the trailers containing the Cyanide processed Film Chips.


Mr. Harry A. Montgomery, President, was contacted at his office and informed of the purpose of this inspection and requested that he point out the location where the trailers are spotted. An inspection with Mr. Montgomery present determined that there are 26 trailers at this site.

There were several trailers dripping a liquid to the ground at the time of this inspection. The dripping was very small at this time. There were also several stains on the ground which indicated that other trailers were leaking at one time or another.

Mr. Montgomery advised that about two weeks to 30 days ago there were people sent to the site by the Attorney General's Office to tar the roofs of the trailers to prevent the leaking. They also spread oil dry in the area of the leaks. He stated that he did not know who the people were, only that they were from the Attorney General's Office.

This inspection determined that the drippings from the trailers will wash into the waterway system in this area during rain. The trailers are deteriorating to a point where in some cases the film chips are visible. The longer the trailers remain on site the more difficult it will be to move them safely because of the deterioration taking place.

There were no samples obtained at this site due to the very slow rate of the drippings.

  
J. Corcoran, PCO II Badge # 111

Wfm 9/20/83

ins per H66 pavement

All Petrochem equipment removed from site  
26 trailers - treated chips - secured,  
but not locked; stain on ground \*  
west end 10 trailers - 9 locked, 1 unlocked, chips  
sampled (possibly untreated)

Slight stain on ground; gravel area, maybe  
200' to sewer, maybe more

\* samples taken, chips fallen from one trailer  
(door open 1"), stream of runoff passing  
thru chips.

Several hundred feet to nearest sewer inlet

### Samples

- #10, #11 chips at east end, #11 water flowed over chips  
#12 pool of water brown near trailer.  
#13 ~~chips at~~ sample of water near trailer #4 (east end)  
#14 chips in W end trailer (unsecured)

Wm 9/20/83

9/14 Wed  
Summit (Archer Ave)

8765 Joliet Rd. \*

6201 S. East Ave.

more significant leaks  
, slight leakage

\* sampled leakage.

Tops of trailers had been field coated.  
Appearance of leachate.

9/14 # 9106

TCN

FCN

905 ppm  
18.8

Cu 133

Cr 106

Fe 38

Ni 168

# 9107

Chips

1608 ppm

Zn 1680 122 Cu

147 Cr

405 Pb

45,000 Fe

110 Ni

9/15

TCN

865

FCN

16.9

Samples 9/20/83

per DWH 9/21/83

#	Title	Str	TCN	FCN
9224	J's Mobile *	3 <sup>sc</sup> pm	15.2	8.60
9225	Kiteway Transport **		7.5	3.88
9226	Eagle Trailer ***	4 <sup>sc</sup> pm	1.03	
9227	Aldens	10	83.1	
9228	"	11	1.30	
9229	"	12	1.98	
9230	"	13	1.28	
9231	"	14	279	

Exact description  
of sampling sites.

- \* Sample at runoff entry to St Sewer CB
- \*\* Hodgkins was taken under trucks
- \*\*\* Runoff sampled at entry to ditch.

Leakage and/or spillage of chips at all 3 sites.

	# trailers	
M	14	fenced in w/gate
H	26	fence thru area walk in
S	27	chain link/chicken wire fence.

- ① Bern w/liner
- ② Possibly tarp or seal truck.

# *Sutton Systems*

## **Complete Film Washing Systems**

Thomas R. Sutton  
P. O. Box 29202

214/484-5435  
Dallas, Texas 75229

September 28, 1983

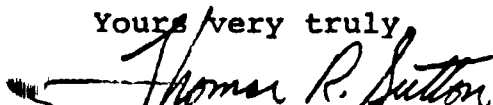
The Attorney General  
State of Illinois  
160 N. LaSalle St.  
Chicago, Illinois 60601

Att: Mr. Howard O. Chinn, P.E.

Re: Cyanide Contaminated Film  
Chicago and Dixon, Illinois

Enclosed is our proposal to solve the above captioned problem.  
We will appreciate your careful consideration.

Yours very truly,

  
Thomas R. Sutton

September 28, 1983

The Attorney General, State of Illinois  
Environmental Control Division (9th Floor)

Attention: Mr. Howard Chinn, P.E.

160 North LaSalle Street  
Chicago, Illinois 60601

Re: Cyanide Contaminated Film  
Chicago and Dixon, Illinois

Gentlemen:

After our meeting on September 7th with Messrs. Joseph A. Drazek and Howard O. Chinn, and an examination of trailers and sites in Chicago, as well as the two warehouses in Dixon, we have studied at length the various methods which would lead to a satisfactory solution of the huge problem that presently exists.

There were originally shown on the chart in your office some 169 trailers in the Chicago area containing cyanide processed film in a hazardous condition at nine different locations within an approximate 24 mile diameter of each other. We are advised that around 1.5 million pounds of the film was decontaminated to remove the cyanide, and now there are five remaining sites with approximately 127 trailers still contaminated with cyanide as well as 27 trailers at the Alden Company on Cicero Avenue and 3 additional trailers at another site that were washed but still have some cyanide present in the film.

At Dixon we found two warehouses (one 190'x67' and the other 288' x 70') and a connecting 10' wide passageway with bulk contaminated film piled as high as 12-14 feet throughout the area, and some film outside the warehouses.

Based upon the above, we propose a twofold solution to this problem, namely:

1. Remove all the film from the trailers at the 5 sites in Chicago, package it in leakproof containers, and ship it to our Texas plant where the cyanide will be decontaminated. Further, we will decontaminate the cyanide level in the trailers where the film is presently stored, as well as the sites under the trailers. Decontamination will reduce the cyanide levels to a maximum of 100 ppm.
2. In view of the magnitude of the Dixon film quantity, we plan to install an on-site decontamination plant, where all the film will be decontaminated to a maximum cyanide level of



Page 2

Attorney General, State of Illinois  
September 28, 1983

100 ppm, packaged and shipped. Further, we will decontaminate any remaining surface cyanide in the warehouses, passageway, and adjoining premises to the same level.

On both the Chicago film located in the trailers, and the Dixon film, we expect to begin these projects within 30 days after the execution of an acceptable contract containing mutually agreeable terms and conditions. We expect to complete the Chicago portion within two months after beginning. On the Dixon portion, due to possible delays in securing and installing the decontamination and rewashing system, we plan on a maximum of 60 days after beginning before we can actually begin processing the film, and about four additional months to completion.

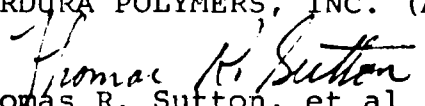
For accomplishing the above solution to the problems, we ask the sum of \$932,000. Because we believe we can recycle a large part of the film, we prefer to not separate the amounts we are asking for decontamination and/or transportation. At the present time, we plan on shipping only the Chicago film to Texas for decontamination. However, we wish to point out that this proposal is not unchangeable. We want to cooperate with your office in solving this critical problem, and welcome the invitation to discuss this matter in greater detail with you. Included in such discussion will be:

1. Our confirmation of financial responsibility
2. Our technical expertise
3. Regulatory knowledge of our procedures
4. Details re work crews, equipment, methods used, bar graphs, etc.

Anticipating the opportunity to work toward the completion of a mutually acceptable solution, this proposal is

Respectfully submitted

CORDURA POLYMERS, INC. (A Texas Corporation)

  
Thomas R. Sutton, et al  
11250 Goodnight, Suite 1103  
(for mail - P.O. Box 29202)  
Dallas, Texas 75229  
214/484-5435